

DAY PITNEY LLP
7 TIMES SQUARE
NEW YORK, NY 10036-7311
(212) 297-5800
Attorneys for Defendant
United Parcel Service, Inc.

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

RICHARD LEBLANC,	:	Docket No. 1:11-cv-06983-KPF
	:	
Plaintiff,	:	
	:	
v.	:	DECLARATION OF
	:	CHRISTINE ROWAN
	:	
UNITED PARCEL SERVICE,	:	
	:	
Defendant.	:	(Document Electronically Filed)

CHRISTINE ROWAN, of full age, hereby affirms as follows:

1. I am currently the East Region Occupational Health Manager for United Parcel Service, Inc. ("UPS") and have held that title since in or about August 2011. Prior to this, I was an Occupational Health Supervisor at UPS for approximately five years. I submit this declaration in support of defendant's motion for summary judgment. I am fully familiar with the facts set forth herein.

2. As part of my role as East Region Occupational Health Manager, I oversee the process UPS uses for both union and non-union employees in UPS's East Region to request job accommodations for their disabilities.

3. I also oversee the maintenance of records relating to accommodation requests by UPS employees within my geographic region.

4. Based upon my review of these records during the course of discovery in this matter and prior to signing this declaration, UPS has no record of any medical accommodation request by Richard LeBlanc.

5. Furthermore, UPS has no record of receiving any paperwork from Richard LeBlanc to request a medical accommodation.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 11, 2013.

By: Christine Rowan
Christine Rowan